

**Air Resources Board
Stationary Source Division
Workshop Summary**

Workshop: Architectural Coatings

Date: July 1, 1999

Location: Sacramento, California

Purpose: To conduct a scoping meeting under the California Environmental Quality Act (CEQA); to present an overview of changes made and under consideration to the Suggested Control Measure (SCM); to receive comments on the Notice of Preparation and Initial Study under CEQA, and on the SCM.

Attendees: The workshop was attended by over 50 people representing paint manufacturers, painting contractors and other users, ingredient manufacturers, public agencies, districts, and industry associations.

Key Points: Comments on CEQA: The beginning of the process is premature since the final project is not in its final form for analysis by affected sources. The project alternatives should be an evaluation of the possible VOC limits in the regulation.

Comments on SCM Process: A number of commenters said that it was unrealistic to expect preparation of a final draft of the SCM, a draft environmental impact report, and staff report by mid-August, and urged an extension of the project deadline. Specific suggestions were to address only the 2001 and 2002 limits this year, followed by another SCM to address the final 2005-2008 limits.

Other comments included: the final limits are not technologically feasible; the industry needs time to review durability studies like the South Coast Air Quality Management District's (SCAQMD) study by National Technical Systems; companies need several years to perform their own field and performance application studies on reformulated products; if limits are set too low, reformulation research is discouraged; all categories negotiated for the national rule should be included for ease of classifying and using coatings; no limits should be lower than SCAQMD Rule 1113; the SCM should be somewhere in the middle of the national rule and SCAQMD limits.

Specific SCM Comments: Concerns were raised on the following definitions: coating, volatile organic compound, waterproofing sealer, anti-graffiti, rust preventative, floor, faux finishing, nuclear, stains, brushing lacquer, metallic pigmented, roof, bituminous, specialty primers. Comments were also received on limits for these categories: rust preventative, industrial maintenance, floor, nonflats, quick-dry enamels, and stains.

Other discussion topics included: maximum VOC content in container labeling requirements; most restrictive VOC limit; industrial maintenance labeling requirements and use restrictions; coating category labeling requirement; “no new use” provision for toxic exempt compounds; low vapor pressure VOC exemption.

ARB emphasized the need for data on VOC contents and volumes, as well as performance data. One manufacturer voluntarily presented performance data on his company’s products, and offered to provide documentation. Other companies expressed a willingness to provide similar information.

Flexibility options: Although many companies indicated that they cannot comply with the proposed interim limits in 2001 and 2002, only one company was interested in using averaging at this time. In general, small companies argue that they don’t have a diverse product line and large companies argue that they can’t track distribution, so averaging is not a priority for them. Enforcement at the district level is problematic, although suggestions that ARB act as a clearinghouse for reporting data, and that cans included in an averaging provision are clearly labeled as such, may help. End-user averaging would be helpful for some public agencies.

A district-administered small volume exemption, which is capped at a certain percent of emissions, was also raised as an option that may be useful to some districts to avoid variances.